

**BEFORE THE  
GEORGIA PUBLIC SERVICE COMMISSION**

<b>In re:</b>	)	
	)	
<b>Consideration of BellSouth</b>	)	
<b>Telecommunications, Inc.'s Entry</b>	)	
<b>Into Interlata Services Pursuant to</b>	)	<b>Docket No. 6863-U</b>
<b>Section 271 of the Telecommunications</b>	)	
<b>Act of 1996</b>	)	

**CERTIFICATE OF SERVICE**

This is to certify that copies of the **AFFIDAVIT OF MARY CONQUEST ON BEHALF OF ITC^DELTACOM COMMUNICATIONS, INC.** have been served upon the following persons and parties of record by hand delivery or first class mail, postage prepaid, this 26<sup>th</sup> day of February, 2002.

Leon Bowles, Director  
Telecommunications Section  
Georgia Public Service Commission  
47 Trinity Avenue, Room 520  
Atlanta, GA 30334-5701

Newton M. Galloway, Esq.  
Dean R. Fuchs, Esq.  
Smith, Galloway, Lyndall & Fuchs, LLP  
100 South Hill Street  
Suite 400 First Union Bank Tower  
Griffin, Georgia 30224

Mr. Reece McAlister  
Executive Secretary  
Georgia Public Service Commission  
47 Trinity Avenue, Room 520  
Atlanta, GA 30334-5701

Sheryl A. Butler, Esq.  
Regulatory Law Office, JAG  
Department of the Army-Litigation Ctr.  
901 N. Stuart Street, Suite 713  
Arlington, VA 22203-1837

Bennett Ross, Esq. (hand delivery)  
BellSouth Telecommunications  
1025 Lenox Park Boulevard  
Suite 6C01  
Atlanta, Georgia 30319-5309

Kristy R. Holley, Director  
Consumers' Utility Counsel Division  
2 MLK Jr. Drive, Suite 356  
Plaza Level, East Tower  
Atlanta, Georgia 30334

Patrick Wiggins, Esq.  
Wiggins & Villacorta  
Suite 200, 2145 Delta Blvd.  
Tallahassee, FL 32303

Benjamin W. Fincher, Esq.  
William R. Atkinson, Esq.  
Sprint Communications Company LP  
3100 Cumberland Circle, GAATLN0802  
Atlanta, Georgia 30339

Mary Ann Walser, Esq.  
Dow Lohnes & Albertson  
One Ravinia Drive, Suite 1600  
Atlanta, Georgia 30346-2108

Brian Sulmonetti, Esq.  
MCI WorldCom  
(Southeastern Competitive Carriers Ass'n)  
6 Concourse Parkway, Suite 3200  
Atlanta, Georgia 30328

Peyton S. Hawes, Jr.  
127 Peachtree Street, Suite 1100  
Atlanta, Georgia 30303-1810

James Falvey, Esq.  
Vice President-Regulatory Affairs  
espire Communications, Inc.  
3399 Peachtree Road, Suite 100  
131 National Business Parkway  
Annapolis Junction, MD 20701

Dan Walsh, Esq.  
Assistant Attorney General  
40 Capital Square, Suite 132  
Atlanta, Georgia 30334

Kim Logue  
LCI International Telecom Corp.  
8180 Greensboro Drive, Suite 800  
McLean, VA 22102

Stephen C. Schwartz  
ATA Communications  
1461 Hagysford Road  
Norbeth, PA 19072

Jim Sherman, Esq.  
Fleming & Ray  
One Midtown Plaza, Suite 930  
1360 Peachtree Street, N.E.  
Atlanta, Georgia 30309

Stephen B. Rowell, Esq.  
ALLTEL Corporate Services, Inc.  
One Allied Drive  
P.O. Box 2177  
Little Rock, Arkansas 72202

Mari L. Myer, Esq.  
Walt Sapronov, Esq.  
Gerry, Friend & Sapronov  
Suite 1450  
Three Ravinia Drive  
Atlanta, Georgia 30339

John Graham  
P.O. Box 1247  
Dalton, Georgia 30722-0804

Allan C. Hubbard  
300 West Service Road  
P.O. Box 10804  
Chantilly, VA 20153-0804

Andrew O. Isar  
The Assoc. of Communications Ent.  
3220 Uddenbert Land, Suite 4  
Gig Harbor, Washington 98335

Frank B. Strickland, Esq.  
Strickland Brockington & Lewis LLP  
1170 Peachtree Street  
Suite 1200  
Atlanta, Georgia 30309

Peter C. Canfield, Esq.  
Dow Lohnes & Albertson  
Suite 1600, One Ravinia Drive  
Atlanta, Georgia 30346

Dana R. Shaffer, Esq.  
V.P. Legal & Government Affairs  
Nextlink Georgia Inc.  
105 Molloy Street  
Suite 303  
Nashville, TN 37201

Anne E. Franklin  
Arnall Golden & Gregory LLP  
2800 One Atlantic Center  
1201 West Peachtree Street  
Atlanta, Georgia 30309

John Silk  
Executive Vice President  
Georgia Telephone Association  
1900 Century Boulevard, Suite 8  
Atlanta, Georgia 30345

Dulaney L. O'Roark, III, Esq.  
MCI WorldCom, Inc.  
6 Concourse Parkway, Suite 3200  
Atlanta, Georgia 30328

Richard M. Rindler, Esq.  
Eric J. Branfman, Esq.  
Swidler Berlin Shereff Friedman LLP  
3000 K. Street NW, Suite 300  
Washington, DC 20007

Mark E. Brown, Esq.  
Vice President  
Regulatory & General Counsel  
13000 Deerfield Avenue  
Suite 30005  
Alpharetta, GA 30005

Rebecca C. Stone, Esq.  
Arnall Golden & Gregory LLP  
2800 West Peachtree Street  
Atlanta, Georgia 30309-3450

John L. Taylor, Jr.  
Chorey Taylor & Feil  
The Lenox Building, Suite 1700  
3399 Peachtree Road NE  
Atlanta, Georgia 30326

Charles V. Gerkin, Jr., Esq.  
Attorney at Law  
Suite 610 – PMB 307  
4135 LaVista Road  
Tucker, Georgia 30085-5003

William Bradley Carver, Esq.  
Alston & Bird LLP  
One Atlantic Center  
1201 West Peachtree Street  
Atlanta, GA 30309-3424

James G. Harralson, Esq.  
BellSouth Long Distance, Inc.  
Legal Department  
28 Perimeter Center East  
Atlanta, Georgia 30346

Robert A. Ganton, Esq.  
Regulatory Law Office  
Department of the Army  
901 N. Stuart Street, Suite 700  
Arlington, VA 22203-1837

Charles F. Palmer, Esq.  
Troutman Sanders LLP  
5200 Nations Bank Plaza  
600 Peachtree Street NE  
Atlanta, Georgia 30309-2216

James M. Tennant  
Low Tech Designs, Inc.  
1204 Saville Street  
Georgetown, SC 29440

Mark M. Middleton, Esq.  
Suite 130, Peachtree Ridge  
3500 Parkway Lane  
Norcross, GA 30092

Tiane L. Sommer  
Morris, Manning & Martin LLP  
Suite 1600, Atlanta Financial Center  
3343 Peachtree Road, N.W.  
Atlanta, Georgia 30326

Catherine Boone, Esq.  
DIECA Communications, Inc.  
d/b/a COVAD Communications  
10 Glenlake Parkway, Suite 650  
Atlanta, GA 30328

Suzanne Ockleberry, Esq.  
AT&T  
Suite 8100  
1200 Peachtree Street, N.E.  
Atlanta, GA 30309

David I. Adelman/rac  
David I. Adelman

## APPENDIX H

February 26, 2002

**VIA HAND DELIVERY**

Mr. Reece McAlister  
Executive Secretary  
Georgia Public Service Commission  
244 Washington Street, S.W.  
Atlanta, Georgia 30334-5701

RE: Docket No. 6863-U - Consideration of BellSouth Telecommunications, Inc.'s  
Entry into InterLATA Services Pursuant to Section 271 of the  
Telecommunications Act of 1996

Dear Mr. McAlister:

By its letter, dated February 18, 2002, in the above-styled docket, the Commission Staff ("Staff") requested that parties respond to certain informational requests stated therein. The purpose of this letter is to inform you that Sprint Communications Company L.P. ("Sprint") has no information that is responsive to Staff's requests. Enclosed please find for filing an original on a 3.5" diskette, a signed original, and fifteen copies of this letter. Thank you for your assistance, and please call me if you should have any questions regarding this matter.

Sincerely,

William R. Atkinson

WRA/tbm

cc: Parties of Record



**Before the  
GEORGIA PUBLIC SERVICE COMMISSION  
Atlanta, Georgia**

In re:	
CONSIDERATION OF BELL SOUTH TELECOMMUNICATIONS, INC.'S ENTRY INTO INTERLATA SERVICES PURSUANT TO SECTION 271 OF THE TELECOMMUNICATIONS ACT OF 1996	Docket No. 6863-U

**AFFIDAVIT OF JOHN FURY**

State of South Carolina     )  
  )   SS.  
County of Greenville        )

I, JOHN FURY, being duly sworn upon oath, do hereby depose and state as follows:

1. My name is John Fury. I am employed by NewSouth Communications Corp. as Carrier Relations Manager. My business address is Two North Main Street, Greenville, SC 29601. I have personal knowledge of the matters set forth in this Affidavit.

2. I am the same John Fury who submitted an affidavit ("Fury Opening Affidavit") in support of the Opening Comments of NewSouth Communications Corp. ("NewSouth Opening Comments") in Georgia Public Service Commission Docket No. 6863-U on May 31, 2001.

3. In the matter before Commission Staff and regarding WorldCom's petition for "expedited workshops or other proceedings" to address OSS, change management and data integrity issues, NewSouth files the following response.

4. Issue (1): Migration by telephone number and name – NewSouth has experienced the issue with RSAG and CSR address mismatches that WorldCom alleges in its petition. Our business and the products that NewSouth offers are distinct from WorldCom, and for that reason NewSouth is not affected to the degree that WorldCom would be. BellSouth uses BOCRIS to match address on flowthrough orders while NewSouth uses LENS and CAFE for address validation. Where



inconsistencies exist, BellSouth insists that a manual order be submitted rather than correcting "in flight" and allowing flowthrough. A spreadsheet itemizing recent RSAG errors is attached to this affidavit as Exhibit A.

5. Issue (2): Parsed CSRs – NewSouth does not currently use pre-order functions provided by BellSouth. CSRs are accessed through LENS and are manually processed.

6. Issue (3): Line Loss Reporting – New South does experience the double billing issues that WorldCom alludes to in its petition. Attached as Exhibit B is a report from NewSouth's maintenance and repair system enumerating recent double billing cases. Data correlating these cases to BellSouth's Line Loss Notification Reporting could not be generated. In addition, the timeframes for resolving billing related issues with BellSouth are excessive.

7. Issue (4): Single C Order Process – Relative to the early experience with migrating customers to the UNE Platform, current BellSouth performance is substantially improved. There have been sporadic cases of premature disconnects which are enumerated in Exhibit C to this affidavit.

8. In addition to the order handling and premature disconnect issues, BellSouth's process impacts customers who request Memory Call and hunting features. Customer mailboxes are torn down in the migration process. Not only is this an inconvenience to the customer, but it also results in order errors when ports are exhausted on the platform currently used by the customer. This also results in a change to the access number for the customer.

9. NewSouth receives numerous complaints related to customer's hunting features. Order handling and translations errors are common. These errors could be mitigated through development of a migration process that did not require separate disconnect and new order actions to be carried out and coordinated.

10. I hereby declare that the foregoing information is true and correct to the best of my knowledge, information and belief.



**PUBLIC DISCLOSURE DOCUMENT**

**EXHIBIT A**

Exhibit A contains confidential and proprietary information and is being submitted pursuant to the Commission's trade secret rules.

**PUBLIC DISCLOSURE DOCUMENT**

**EXHIBIT C**

Exhibit C contains confidential and proprietary information and is being submitted pursuant to the Commission's trade secret rules.

**PUBLIC DISCLOSURE DOCUMENT**

**EXHIBIT B**

Exhibit B contains confidential and proprietary information and is being submitted pursuant to the Commission's trade secret rules.



22

In re:	
CONSIDERATION OF BELL SOUTH TELECOMMUNICATIONS, INC.'S ENTRY INTO INTERLATA SERVICES PURSUANT TO SECTION 271 OF THE TELECOMMUNICATIONS ACT OF 1996	Docket No. 6863-U

## Response to Data Request

On January 18, 2002, WorldCom, Inc. (“WorldCom”) filed a petition in this docket requesting “expedited workshops or other proceedings” to address various issues related to BellSouth Telecommunications, Inc.’s (“BellSouth”) operational support systems (“OSS”). On February 18, 2002, Mr. Leon Bowles, Director of the Commission’s Telecommunications Division, issued a data request directing all parties in the docket to file information concerning certain issues raised in WorldCom’s petition. ICG Telecom Group, Inc. (“ICG”) hereby responds to that data request as follows:

### (1) Migration by Telephone Number and Name

ICG does not use this functionality of BellSouth's OSS and has no information concerning its operation or that is otherwise responsive to this request.

## (2) Parsed CSRs

ICG has not implemented an electronic interface to BellSouth's pre-ordering systems and thus has no information concerning BellSouth's parsed CSR functionality or how it compares to the comparable functionality provided by other ILECs or that is otherwise responsive to this request.

### **(3) Line Loss Reporting**

As a facilities-based carrier that does not utilize the UNE Platform or resell any significant quantity of BellSouth access lines, ICG does not receive or rely upon line loss reports from BellSouth and has no information that is responsive to this request.

### **(4) Single C Order Process**

As a facilities-based carrier that does not utilize the UNE Platform, ICG has no information concerning customers who have lost dial tone as a result of BellSouth's use of an "N" and "D" order or that is otherwise responsive to this request.



Before the  
GEORGIA PUBLIC SERVICE COMMISSION  
Atlanta, Georgia

In re:	
CONSIDERATION OF BELL SOUTH TELECOMMUNICATIONS, INC.'S ENTRY INTO INTERLATA SERVICES PURSUANT TO SECTION 271 OF THE TELECOMMUNICATIONS ACT OF 1996	Docket No. 6863-U


STATE OF COLORADO     )  
                                      )  
COUNTY OF ARAPAHOE    )

**AFFIDAVIT**

I hereby certify that I have reviewed the foregoing response of ICG Telecom Group, Inc. to the directive issued by the Georgia Public Service Commission Staff on February 18, 2002 to provide certain information concerning BellSouth Telecommunications, Inc.'s operational support systems and that the information contained in this response is true and correct to the best of my knowledge, information and belief. I further affirm that I have the responsibility and authority to make this certification on behalf of ICG Telecom Group, Inc.

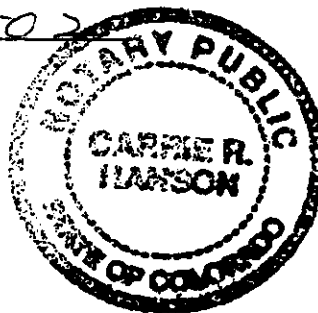
  
\_\_\_\_\_  
Amy Hartzler  
Senior Director, Business & Government Affairs  
ICG TELECOM GROUP, INC.

SWORN TO AND SUBSCRIBED before me this  
21<sup>st</sup> day of February, 2002.

  
\_\_\_\_\_  
Notary Public

My Commission Expires: 8-1-02

[SEAL]





FRIEND, HUDAK & HARRIS, LLP

ATTORNEYS AT LAW

SUITE 1450

THREE KAVINIA DRIVE

ATLANTA, GEORGIA 30346-2117

(770) 399-9500

FACSIMILE (770) 395-0000

EMAIL: fh2@fh2.com

February 25, 2002

**VIA HAND DELIVERY**

Reece McAlister  
Executive Secretary  
Georgia Public Service Commission  
244 Washington Street, S.W.  
Atlanta, Georgia 30334


Re: Consideration of BellSouth Telecommunications, Inc.'s Entry into  
InterLATA Services Pursuant to Section 271 of the Telecommunications  
Act of 1996; Docket No. 6863-U

Dear Mr. McAlister:

This letter is in response to the Georgia Public Service Commission (the "Commission") staff's February 18, 2002 request to all parties of record in the above-referenced docket. Time Warner Telecom of Georgia, L.P. ("TWTC") does not purchase unbundled network elements and utilizes different ordering processes to purchase special access service. Consequently, TWTC is unable to provide responses to the specific data requests at this time.

If you have any questions or comments, please do not hesitate to call.

Sincerely,



Ronald V. Jackson

RVJ/nb  
Enc.

cc: Charles B. Welch, Jr., Esq.  
Charles A. Hudak, Esq.

DOCUMENT OFF-LINE

This page has been substituted for one of the following:

- o An oversize page or document (such as a map) which was too large to be scanned into the ECFS system.

- o Microfilm, microform, certain photographs or videotape.

- o Other materials which, for one reason or another, could not be scanned into the ECFS system.

The actual document, page(s) or materials may be reviewed by contacting an Information Technician at the FCC Reference Information Center, at 445 12<sup>th</sup> Street, SW, Washington, DC, Room CY-A257. Please note the applicable docket or rulemaking number, document type and any other relevant information about the document in order to ensure speedy retrieval by the Information Technician

1 CD ROM